

Commercial Operations Advisory Committee
Washington D.C.

October 12, 2007

The Honorable Michael Chertoff
Secretary
U.S. Department of Homeland Security
245 Murray Lane, SW
Washington, DC 20528-0300

Re: Proposed Global Trade Data Exchange

Dear Secretary Chertoff:

I am writing as Chair of the Interdepartmental Advisory Committee on the Commercial Operations of U.S. Customs & Border Protection (COAC) and on behalf of the listed members of this committee, I would like to provide recommendations on our role in development of the proposed Global Trade Data Exchange (GTX).

The members of COAC are jointly appointed by you and the Secretary of the Treasury. COAC is chartered under the Federal Advisory Committees Act. The committee is responsible not only for advice and oversight of the commercial operations of U.S. Customs & Border Protection, but is also involved with other agencies of DHS and Treasury where they affect supply chain security and commercial imports into the US.

The COAC Committee members have taken great interest in GTX and expressed this interest to you during the last public meeting of the COAC on August 16, 2007. We are supportive of any new proposal that would facilitate legitimate trade, identify non-compliant imported products and simplify the international supply chain, but require further information to do so. We also have a charter under the SAFE Port Act of 2006 to be involved in the design and development of new proposals and programs effecting the import and Customs processes, prior to their implementation. This policy to assure collaboration with COAC was followed faithfully by DHS in the development of C-TPAT, and other programs and has served to improve the final product and facilitate implementation.

Accordingly, we respectfully request that DHS involve the COAC committee in the development of the GTX concept, before any segment of it is developed outside of this consultative process. The committee members are both knowledgeable and experienced and stand ready to provide useful input to the GTX program during its design, development and deployment stages. By working together, we can best achieve sound, practical results that will facilitate trade and improve security, while protecting the confidentiality of trade data. You have expressed that you want to move forward with GTX without any unnecessary delay. By working with COAC, DHS can have both solid progress and valuable trade input.

Members of COAC would be pleased to meet with you or your designates to further discuss development of this program. Please contact me at (562) 810-8084 or by email at bruce.h.leeds@boeing.com to arrange a meeting.

We look forward to your reply and to working with you, DHS and the full membership of the COAC on the effective development of GTX.

Respectfully submitted,

Commercial Operations Advisory Committee



Bruce H. Leeds, Esq , Chair

CC: Dep Secretary Michael Jackson
Michael Mullen, US Customs & Border Protection

Members of COAC

Earl Agron

Samuel Banks

Anthony Barone

Adrienne Braumiller

William Cook

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Christopher Koch

Barry O'Brien

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